

29th July 2022

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Dear Sir/Madam

Further comments regarding the protection of the North Leamington Green Belt around Old Milverton and Blackdown Settlement Boundaries for the South Warwickshire Local Plan

We write on behalf of our client, Old Milverton and Blackdown Joint Parish Council, in response to the South Warwickshire Local Plan Scoping and Call for Sites publication in the interest of the North Leamington Green Belt which washes over the Parish. The boundary of which is marked by a red line on the site plan below.

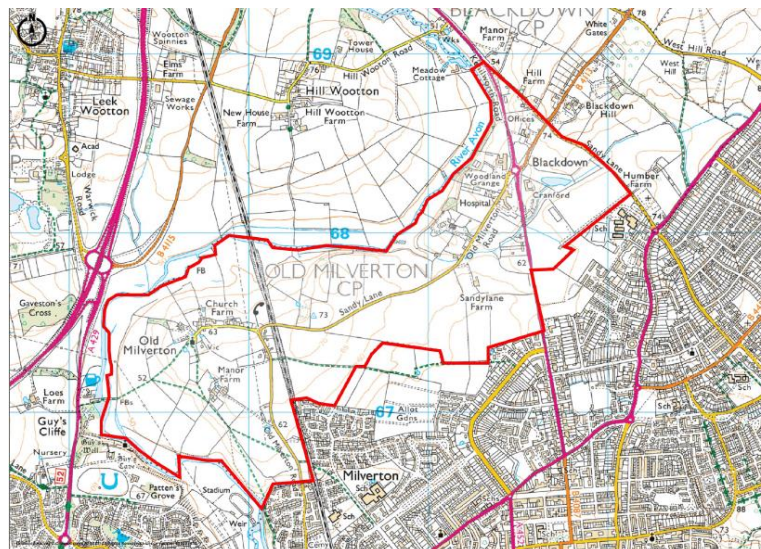


Figure 1: The Site boundary

A representation was submitted on behalf of the Parish Council in response to the South Warwickshire Local Plan Scoping and Call for Sites Consultation (July 2022) (see appendix A). This representation outlined the importance of the North Leamington Green Belt and demonstrates how allocating the site for the proposed uses would be contrary to the NPPF’s and its aim to safeguard and preserve the green belt, particularly where it meets the enlisted purposes.

Since then, the call for site consultation indicates that the site has been made available for open space and green infrastructure. This letter reiterates why the North Leamington Green Belt around Royal Leamington Spa Settlement Boundary should be protected (see site location plan in Appendix B). It reaffirms the Parish Council's support to protect the Green Belt against insertions into the Green Belt that could harm its landscape qualities.

Site Location and Description

The site is wholly within North Leamington. The Green Belt washes over the settlements of Old Milverton and Blackdown. The area of land submitted to the Council comprises approximately 280 hectares of greenfield land.

Old Milverton and Blackdown are neighbouring parishes to the north of Leamington Spa Town. The Joint Parishes form the northern gateway to the historic, Regency town of Royal Leamington Spa and the southern gateway to Kenilworth, famous for its castle with Elizabethan connections. The medieval castle of Warwick is 3 miles away.

There are several open spaces and playing fields within proximity to the site. These include:

- Cubbington waterworks Lillington (0.5 miles east from the site);
- Dragon Cottage play area (0.1 miles south of the site)
- Mason Avenue Park (1.1 miles southeast from the site)
- Midland oak park and (0.7 miles south of the site)
- The holt (1 mile east of the site)

Relevant Planning Policy

The current development plan for the site comprises the Warwick Local Plan (2011-2029) adopted in September 2017.

Policy DS4 sets out the spatial strategy of growth in the Warwick District. The policy aims to focus growth within and adjacent to built-up areas, with the majority of growth being focused on the main urban areas of Warwick, Leamington, Whitnash and Kenilworth, with some growth being directed to the growth villages such as Cubbington.

Policy DS19 of the adopted Local Plan confirms the Council will apply national guidance within the Green Belt. The fundamental aim of the Green Belt policy is to prevent urban sprawl and keep land permanently open.

Policy HS2 states that development on, or change of use of open spaces and sport and recreation facilities will not be permitted unless:

- a) an alternative can be provided that is at least equivalent in terms of size, quality, accessibility, usefulness and attractiveness, and a management plan is submitted to ensure the future viability of the provision, or
- b) there is a robust assessment demonstrating a lack of need for the asset currently or in the future. Development of open spaces for sport and recreation purposes will be permitted subject to the proposal being of sufficient benefit to clearly outweigh the loss.

Policy HS3 states that the Council supports the principle of designating land as Local Green Space.

Policy HS4 outlines that contributions from developments will be sought to provide, improve and maintain appropriate open space, sport and recreational facilities to meet local and district-wide needs. The exact level and form of contributions required will have regard to the location, nature and size of the development.

National Planning Policy Framework

Since the submission, there has been a revised National Planning Policy Framework ('the Framework') that was issued in July 2021. The most relevant policies are enlisted below:

Chapter 13 regards the protection of Green Belt Land. Specifically, **Paragraph 137** states that "the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence".

Paragraph 138 sets out that Green Belt serves five purposes:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns from merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Paragraph 140 states "*once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans*".

Paragraph 141 states that once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use.

Paragraph 147 defines ‘inappropriate development’ as development that is ‘harmful to the Green Belt and should not be approved except in very special circumstances.

Paragraph 149 sets that that “a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:

1. buildings for agriculture and forestry;
2. the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
3. the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
4. the replacement of a building provided the new building is in the same use and not materially larger than the one it replaces;
5. limited infilling in villages;
6. limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
7. limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:
 - not have a greater impact on the openness of the Green Belt than the existing development; or
 - not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

The site also has a rich cultural heritage and contains several listed buildings.

Green Belt Considerations

Joint Green Belt Study

The most recent review of the North Leamington Green Belt was undertaken in 2015 as part of the evidence base supporting the Warwick District Local Plan¹. This study assessed the Green Belt in Warwick District council against the five purposes of Green Belts, as set out in the National Planning Policy Framework (NPPF).

¹ Joint Green Belt Study (JGBS) 2015

The JGBS found that the site made a considerable contribution to all the purposes of the Green Belt for the reasons set out below:

- “Checking the sprawl of Royal Leamington Spa, Kenilworth and Coventry.
- Preventing the merging of neighbouring towns in the long term, particularly Royal Leamington Spa and Kenilworth and Kenilworth and Coventry.
- Safeguarding the countryside, including a number of large woodlands, such as Ryton Wood.
- Preserving the setting and special character of the historic towns of Royal Leamington Spa, Kenilworth and Coventry.
- Assisting urban regeneration by encouraging the recycling of derelict and other urban land across the West Midlands.”

Additionally, the JGBS highlighted that there were particular green belt parcels found within the site (Parcel numbers; RL1, RL2 RL3, WA6) that were considered to be “Higher-performing Green Belt parcels”. These parcels were deemed to contribute well to the purposes of the Green Belt.

Enhancing Green Belt Land

As highlighted above, Paragraph 137 of the Framework attaches great importance to Green Belts and Paragraph 145 outlines that once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.

It is noted that policy HS5 of the WLNP supports Open space/ sports and recreation facilities within the Green Belt. In addition, Paragraph 149 of the NPPF states that there are exceptions towards development in the Green Belt such as the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreations.

Given the above, it is clear that there is already allowance and opportunities relating to the desired use of this land. The removal of this land to the Green Belt is considered unnecessary and only exposes the landscape to harm to its openness through buildings that are otherwise inappropriate in the Green Belt.

Protecting Green Belt Land

Further to this, the Framework also states that before considering releasing land from the Green Belt, Councils will be required to demonstrate that exceptional circumstances exist to justify changing the Green Belt boundary. This

will be accessed through the examination of strategic policies but should consider all other reasonable options for meeting identified needs. These include:

- Making as much use as possible of suitable brownfield sites and underutilised land;
- Optimising the density of developments; and
- Discussions with neighbouring authorities to ascertain whether they could accommodate the identified need.

By removing this site from the Green Belt, the Council and the National Policy test of safeguarding the openness of such sites will be lost.

Whilst the above relates mainly to actual development, it is our view that the release of this land would be inappropriate and far exceed the need for open space and green infrastructure.

Need for Open Space

Whilst we acknowledge that there are current policies to support open space development in the Green Belt, it is considered that making the whole site available for this change could lead to landscape harm. We would therefore urge the council to protect this landscape.

When considering the existing typology, the Warwick Local Plan outlines that a minimum of 5.47ha of unrestricted public open space is required per 1000 heads of the population. For this site the amount of land that could allow provision for approximately, 49,122 people. Thus, beyond any requirement for open space at Leamington Spa or other settlements within a sustainable distance to access it.

We, therefore, conclude that this area of land is not needed and is currently unsupported by any form of evidence to justify the amendment to the Green Belt boundary.

Purposes of the Green Belt

The National Planning Policy Framework identifies in Paragraph 138 the 5 purposes for designating land as Green Belt. These are considered in brief below to understand if there is any likely justification for the land in question to be released from the Green Belt. To reiterate, it is from our and the client's perspective that the site fulfils all 5 purposes set out for the Green belt land.

Purpose A - To check the unrestricted sprawl of large built-up areas

As mentioned previously, the site comprises an agricultural land parcel which is adjacent to the existing urban area of North Leamington. The majority of the site is open green space and agricultural fields. The Green Belt borders

the edge of North Leamington Spa and helps to prevent any further development from encroaching into the countryside and prevents urban sprawl.

Currently, there is no strong defensible boundary to the Green Belt apart from the existing urban edge of Leamington Spa. If the future South Warwickshire Local released this land from the Green Belt, then it is challenging to see how a new defensible boundary could be introduced to prevent harm to the openness of this landscape and prevent development sprawl.

It is our view that the Site still contributes to the prevention of urban sprawl which is an important role for any site in the Green Belt.

This was further supported in the technical evidence for the Warwick Local Plan and the Coventry Joint Review 2009 of the Green Belt land around Warwick. It was recognised that this part of the Green Belt played an important contribution towards restricting sprawl from the North of Leamington Spa. This was further reiterated in the JGBS 6 years later.

Purpose B- To prevent neighbouring towns from merging into one another

It was acknowledged in the Joint Green Belt Study 2015 that this site was essential in preventing the merging of neighbouring towns. This Green Belt helps to prevent Leamington Spa and Kenilworth, as well as potentially hindering the rural tranquillity within the rural area including villages like Old Milverton and Black Down.

This is supported by the findings in the West Midlands Joint Green Belt Study 2015 which confirmed that this area of the Green Belt is particularly important because it remains an appropriate gap between Leamington and Kenilworth to the north ensuring the character of each retained and the settlements will not merge into one another. Paragraph 4.19 highlights that this part of the green belt contains high-performing parcels which help to prevent the long-term merging of settlements in the vicinity.

If the future South Warwickshire Plan alters this green belt land, then this will fundamentally undermine the designation of the Green Belt in this location. Given the above, it is important to note that this area of Green Belt complies with Paragraph 138 criterion b) of the NPPF.

Purpose C - To assist in safeguarding the countryside from encroachment

The Leamington Spa Green Belt is open and its designation safeguards the surrounding countryside from the encroachment of development. This is supported by the findings of the JGBS. Therefore, this site complies with Paragraph 138 criterion c) in the NPPF as it serves to assist in safeguarding the countryside from encroachment.

Purpose D - To preserve the setting and special character of historic towns

Changing the use of this could affect the setting and special characteristics of the historic settlements including Old Milverton and Blackdown. This is supported by the findings in the West Midlands Joint Green Belt Study 2015. Paragraph 4.21 outlines that the green belt parcels bordering Rugby, Warwick and Royal Leamington Spa contribute to the setting and special character of these historic towns (by virtue of good intervisibility with the historic cores),

In particular, the green belt parcels that are relevant to the site (Parcel References.: RL1, RL2 RL3, WA6) are identified as having important views into the historic cores of Royal Leamington Spa and/or Warwick. The report outlined that these parcels were of high importance and should be preserved.

Furthermore, it is important to note that the Countryside Agency's Character of England Map identifies the site as being located within the Arden Landscape Character Area. This is an area of former wood pasture and ancient farmlands which lies on the eastern side of the Birmingham plateau. The Coventry Joint Review 2009 of Green Belt land outlined that *'Although there are few dramatic physical features, the Arden countryside is considered to have a historic character.* Therefore, allowing the development on this site could impact the landscape character area found in the site.

Additionally, we would like to reiterate that the Planning Inspector noted the importance of this land in terms of character and appearance in his written examination of the Warwick Local Plan in Paragraph 201. This is stated in full below:

"Development of the land in question would involve a substantial expansion of the built-up area into currently open countryside to the north of Leamington Spa. It would have a significant adverse impact on the openness of the Green Belt and the character and appearance of the area."

Given the above, it is considered that the removal of the site from the Green Belt will affect the purpose of preserving the setting and special character of historic villages and historic buildings that lie within the land in question. Unequivocally causing damage to the openness of this landscape.

Purpose E - To assist urban regeneration by encouraging the recycling of derelict and other urban land

As stated in our previous representation, and in the JGBS, the release of any of the land in question from the Green Belt would prevent the recycling of derelict land and urban land within Warwick District.

In this regard, a detailed understanding of previously developed land that is available for development should be fully explored before considering the release of any land from the Green Belt.

In summary, an overview of the Green Belt’s function is presented within the JGBS and is illustrated in Figure 2 below:

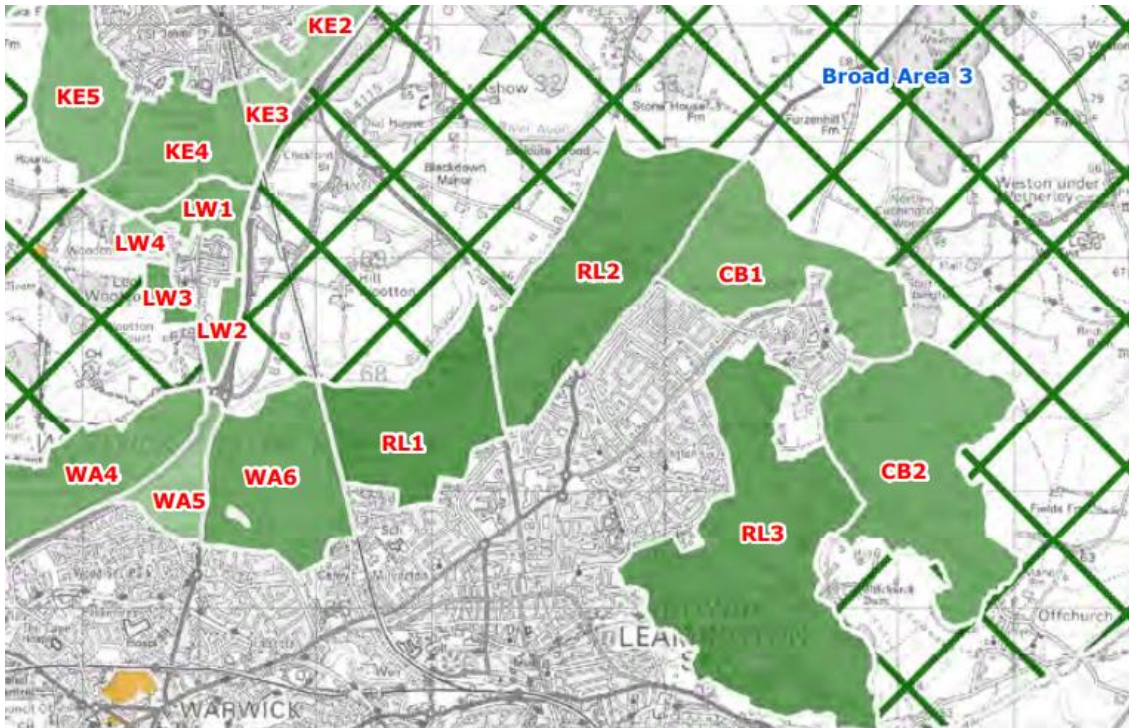


Figure 2: Site in the JGBS

Summary

This letter has been prepared by Ridge and Partners LLP on behalf of Old Milverton and Blackdown Joint Parish Council in response to the South Warwickshire Local Plan Call for Sites prior to the Council’s assessment. This document reiterates the reasons why the North Leamington Green Belt, particularly at the site, should be protected. It has shown how this Green Belt land serves all 5 purposes.

The above has demonstrated how exceptional circumstances are unlikely to exist that would allow for the release of this land from the Green Belt. This letter also set out how releasing this land would be contrary to the aims and objectives of the Green Belt.

Finally, we would also like to reiterate that if incursions into the Green Belt are going to be considered as part of the development of the collaborative working between Warwick and Stratford Council, this should be informed by a comprehensive and up-to-date Green Belt review. We note from the South Warwickshire Local Plan website that a Green-Belt review is not currently planned as part of the evidence for the Local Plan which would lead us to assume that Green Belt release is not considered a strategic proposition

In light of the above, it is requested that the subject site continues to carry out its important role as part of the North Leamington and is safeguarded by any form of allocation in the future South Warwickshire Local Plan.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Giles Brockbank', is written over a light grey grid background.

Giles Brockbank MRTPI
Partner
For Ridge and Partners LLP

APPENDIX 1

Original letter submitted to the South
Warwickshire Call For sites 2021



5th July 2021

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Planning Department
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Dear Sir/Madam

Local Plan Scoping and Call for Sites Consultation Regarding the protection of the North Leamington Green Belt around Old Milverton and Blackdown Settlement Boundaries

We write on behalf of our client, Old Milverton and Blackdown Joint Parish Council , in response to the South Warwickshire Local Plan Scoping and Call for Sites Consultation. First and foremost, we are grateful for the extension of time granted for us to reply to this Scoping and consultation. We would like to thank Hayley Smith and Phillip Clark for granting us this extension.

These representations are made in the context of Old Milverton and Blackdown Joint Parish Council’s interest in the North Leamington Green Belt which washes over the Parish, the boundary of which is marked by a redline on the site plan attached (ref. Promap-1442234-1542664). The Parish Council would like to reaffirm their support for the protection of the Green Belt across the Parish and to protect against the encroachment of development to the north of Leamington. If incursions into the Green Belt are going to be considered as part of development of the collaborative working between Warwick and Stratford Council’s this should be informed by a comprehensive and up-to-date Green Belt review.

This representation has been prepared by Ridge and Partners LLP on behalf of Old Milverton and Blackdown Joint Parish Council in relation to the South Warwickshire Local Plan Scoping and Call for Sites consultation. This document sets out why ‘North Leamington Green Belt around Old Milverton and Blackdown Settlement Boundaries should be protected. It has also outlined that the site should be protected from Green Belt Growth opportunities in the future South Warwickshire Local Plan.

In light of the above, it is requested that the subject site is preserved from any allocation of development in the future South Warwickshire Local Plan and remains as Green Belt land.

This Covering letter seeks to respond to some of the consultation questions set out in the South Warwickshire Local Plan, Stage 1: Scoping and Call For Sites Consultation. Specifically, this letter aims to answer Question 52. Which is

“Notwithstanding your preferred Growth Option, do you agree that we should explore growth opportunities in Green Belt locations? If not, why not?”.

To a lesser extent this letter also addresses two further questions identified in the South Warwickshire Local Plan, Stage 1: Scoping and Call For Sites Consultation:



Question 28. *“Is it important to ensure that the development of best agricultural land is avoided wherever possible? Please explain your answer”.*

Question 30 *“Is the protection of, and enhancement of our green areas and associated habitat / biodiversity a high priority for the Local Plan? Are there any other matters that should be considered?”*

The site has had previous development history. In preparation for the 2017 Warwick Local Plan the Council proposed removing some of the land from the Green Belt and allocate it for housing. The estimated capacity of the housing site was 250 dwellings. This proposal was never progressed and the Planning Inspector identified the importance of this Green Belt Land in his written examination statement (Chapters 200-203). The Planning Inspector did not believe that removal of this Green Belt land was needed in order to ensure that the District’s housing requirements are met or that a five-year supply of housing land was provided for.

As matters stand, it is considered that the Green Belt in question meets the 5 purposes that Green Belts serve as stipulated in Paragraph 133 of the NPPF which are:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The grounds of support identified above will be addressed individually in more detail below however in the first instance, a summary of relevant planning policy will be provided along with a brief description of the site.

Site Location and Description

The site is the Green Belt land that washes over the settlements of Old Milverton and Blackdown. For the context of this letter, we refer the land in question as ‘the site’. The Site is particularly important, as highlighted above, as it has served its designated purpose of preventing urban sprawl, avoiding town merging into one another and safeguarding the countryside and its special character. In this regard, it has very effectively prevented Leamington, Kenilworth and Coventry merging. It also stops the communities of Old Milverton and Blackdown merging with Leamington safeguarding the countryside to the north of Leamington.

The site is in multiple ownership and is not currently part of any active promotion for development. However, when the present Warwick Local Plan was under consideration, we were aware that the area to the south of Old Milverton Lane between Kenilworth Road (A452) and the railway line was of interest for development which never materialised.

Old Milverton and Blackdown are neighbouring parishes to the north of Leamington Spa Town. The Joint Parishes form the northern gateway to the historic, Regency town of Royal Leamington Spa and the southern gateway to Kenilworth, famous for its castle with Elizabethan connections. The medieval castle of Warwick is 3 miles away.

Designations

The site lies within the Green Belt which, for the reasons set out above, serves its purpose.

Old Milverton is classified as 'Infill Village' in the WDLP. Paragraph 4.8 in the WDLP outlines that in the case of Limited Infill Villages which are included within the Green Belt, the type and scale of development will be more limited. In line with national Green Belt policy, appropriate development includes rural affordable housing, limited infill development, the re-use of buildings; the redevelopment or partial redevelopment of previously developed land and replacement dwellings.

The Northern boundary of Old Milverton runs along the meandering course of the River Avon to where the river crosses river A452. The Green Belt adjacent to Old Milverton falls under Flood zone level 2 and 3.

The site also has a rich cultural heritage and contains several listed buildings.

Relevant Planning Policy

Warwick Local Plan 2011-2029

The Warwick District Local Plan (WDLP) was adopted in September 2017. The following policies of relevance to the proposed development are summarised as follows:

Policy DS4 sets out the spatial strategy of growth in the Warwick District. The policy aims to focus growth within and adjacent to built-up areas, with the majority of growth being focused on the main urban areas of Warwick, Leamington, Whitnash and Kenilworth, with some growth being directed to the growth villages such as Cubbington.

Policy DS19 of the adopted Local Plan confirms the Council will apply national guidance within the Green Belt. The fundamental aim of Green Belt policy is to prevent urban sprawl and keep land permanently open.

National Planning Policy Framework

Paragraph 133 of the NPPF outlines that the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

Paragraph 134 states that the Green Belt serves five purposes which are

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Paragraph 136 states that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green ~~Belt~~Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.

Paragraph 143 of the National Planning Policy Framework (the Framework) indicates that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. In **paragraph 145** it is stated that the construction of new buildings in the Green Belt should be regarded as inappropriate subject to a number of exceptions. This includes the limited infilling or the partial or complete redevelopment of previously developed land (PDL), so long as it would not have a greater impact on the openness of the Green Belt than the existing development. However, where affordable housing is proposed which contributes to an existing need, there should not be substantial harm to the openness of the Green Belt.

Green Belt Considerations

In delivering sustainable development, the Framework attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. The Framework states that before considering releasing land from the Green Belt, Councils will be required to demonstrate that they have fully examined all other reasonable options for meeting its identified need for development. This includes:

1. Making as much use as possible of suitable brownfield sites and underutilised land;
2. Optimising the density of developments; and
3. Discussions with neighbouring authorities to ascertain whether they could accommodate the identified need.

The National Planning Policy Framework identifies at Paragraph 134 the 5 purposes for designating land as Green Belt. These are considered in brief below to understand if there is any likely justification for the land in question to be released from the Green Belt.

Purpose A - To check the unrestricted sprawl of large built-up areas

The site comprises agricultural land parcel which is adjacent to the existing urban area of North Leamington. The majority of the site is open green space and agricultural fields. The Green Belt abuts the edge of North Leamington SPA and stops any further development from encroaching into the countryside and prevents urban sprawl. Therefore, if any of this land is allocated for housing or employment in the emerging South Warwickshire Plan than this would extend built development beyond the urban edge of Leamington and would therefore encroach upon the openness of the Green Belt. This would lead to an unrestricted sprawl of development.

As matters stand, there is no strong defensible boundary to the Green Belt apart from the existing urban edge of Leamington. Therefore, if development were allowed to the it is difficult to see how a new defensible boundary could be introduced to prevent development sprawl. Consequently, protecting the Green Belt land is essential in this case as it clearly serves its purpose to prevent urban sprawl.

Purpose B- To prevent neighbouring towns from merging into one another

This site is essential in preventing neighbouring towns from merging into one another. In particular, the Green Belt helps to prevent and Old Milverton and Blackdown from merging with Leamington.

Moreover, this area of the Green Belt is particularly important because it has maintained an appropriate gap between Leamington and Kenilworth to the north ensuring the character of each retained and the settlements will not merge into one another.

If the Green Belt is altered to the north of Leamington this will fundamentally undermine the designation of the Green Belt in this location which is in place to prevent settlements merging. As such, this area of Green Belt complies with Paragraph 134 criterion b) in the NPPF.

Purpose C - To assist in safeguarding the countryside from encroachment

The Green Belt around Old Milverton and Blackdown is open in character and its designation safeguards the surrounding countryside from the encroachment of development. As such, this area of Green Belt complies with Paragraph 134 criterion c) in the NPPF as it serves to assist in safeguarding the countryside from encroachment.

Purpose D - To preserve the setting and special character of historic towns

Future development of this site would affect the setting and special characters of the historic settlements of Old Milverton and Blackdown and development would be at odds with this purpose of the Green Belt. This is supported by the findings in the *West Midlands Joint Green Belt Study 2015*. Paragraph 4.21 outlines that the green belt parcels bordering Rugby, Warwick and Royal Leamington Spa contribute to the setting and special character of these historic towns (by virtue of good intervisibility with the historic cores. In particular the green belt parcels that are situated in Old Milverton and Blackdown (Parcel numbers; RL1, RL2 RL3, WA6) were identified as having good views into the historic cores of Royal Leamington Spa and/or Warwick and should be preserved.

In addition, the Planning Inspector noted the importance of this land in his written examination of the Warwick Local Plan. The Planning Inspector felt that the development of this site would involve a substantial expansion of the built-up area and it would have a significant adverse impact on the openness of the Green Belt and the character and appearance of the area.

Therefore, the removal of the site from the Green Belt will affect the purpose of preserving the setting and special character of a historic villages and historic buildings that lie within the land in question. As such this area of Green Belt complies with Paragraph 134 criterion d) in the NPPF which confirms that this area serves the purpose of to preserving the setting and special character of these historic settlements.

Purpose E - To assist urban regeneration by encouraging the recycling of derelict and other urban land

The release of the any of the land in question from the Green Belt would prevent the recycling of derelict land and other urban land within Warwick District .

In this regard a detailed understanding of previously development land that is available for development should be fully explored before considering the release of any land from the Green Belt.

In summary, the proposed allocation does fulfil a strategic Green Belt function and its loss will issues of coalescence. Removal of the land from the Green Belt, and its allocation for housing, will harm all five purposes of the Green Belt set out in Paragraph 133 of the NPPF. From the reasons outlined above we believe that the South Warwickshire Local Plan should not investigate growth opportunities in Green Belt locations like in this site. We would therefore wholeheartedly disagree with question 52 as this site still serves all 5 purposes of the Green Belt.

Other Matters

This section hopefully addresses some of the other questions found in the *South Warwickshire Local Plan, Stage 1: Scoping and Call For Sites Consultation*.

It is worth noting that this site has become an important resource since the Covid 19 Pandemic began. The site sits on the periphery of Old Milverton and Blackdown villages as well as to the north of Leamington. This green space is easily accessible for walkers and cyclist and become an invaluable green space for people to interact in during Lockdown. ~~If anything anything,~~ we would prefer to promote this site as an important Green and open space because of the benefits it gives to the residents.

In terms of agricultural land quality, the allocation site around Old Milverton comprise Grade 2 and Grade 3a agricultural land (except for a minor strip of Grade 3B) and is therefore best and most versatile. The NPPF is clear that 'Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality'. Therefore, the Green Belt land around Old Milverton in particular is certified to be important necessary land where development should be avoided as mentioned in question 28.

In response to question 30 the reasons outlined above have shown why the site is an important Green belt parcel which serves the 5 purposes set out in the NPPF. Notwithstanding that it is important that this site is highlighted in the Local Plan as an important green space that would benefit from further enhancement and protection. This would help support its uses as identified above.

At this moment in time the client would like to make it explicitly clear that they do not support Growth Option G (village development) for the reasons outlined above. The client will contact the council at a later date with their preferred growth option.

Summary

This representation has been prepared by Ridge and Partners LLP on behalf of Old Milverton and Blackdown Joint Parish Council in relation to the South Warwickshire's Call for Sites consultation. This document sets out why 'North Leamington Green Belt around Old Milverton and Blackdown Settlement Boundaries should be protected. It has also ~~outline outlined~~ the site should be protected from Green Belt Growth opportunities in the future South Warwickshire Plan.

The above has demonstrated how the site is not a suitable location for residential development, and also sets out how allocating the site for residential development would be in disagreement with NPPF's definition of sustainable development.

Government guidance and the policy position within the WDLP actively encourages protection of Green Belt development unless it satisfies a number of criteria. This covering letter shows that there is not suitable government policy to allow for development on this site. It has shown that this area of Green belt land is still important and meets all 5 tests of the National Planning Policy Framework.

In light of the above, it is requested that the subject site is preserved from any allocation of development in the future South Warwickshire plan and remains as Green Belt land.

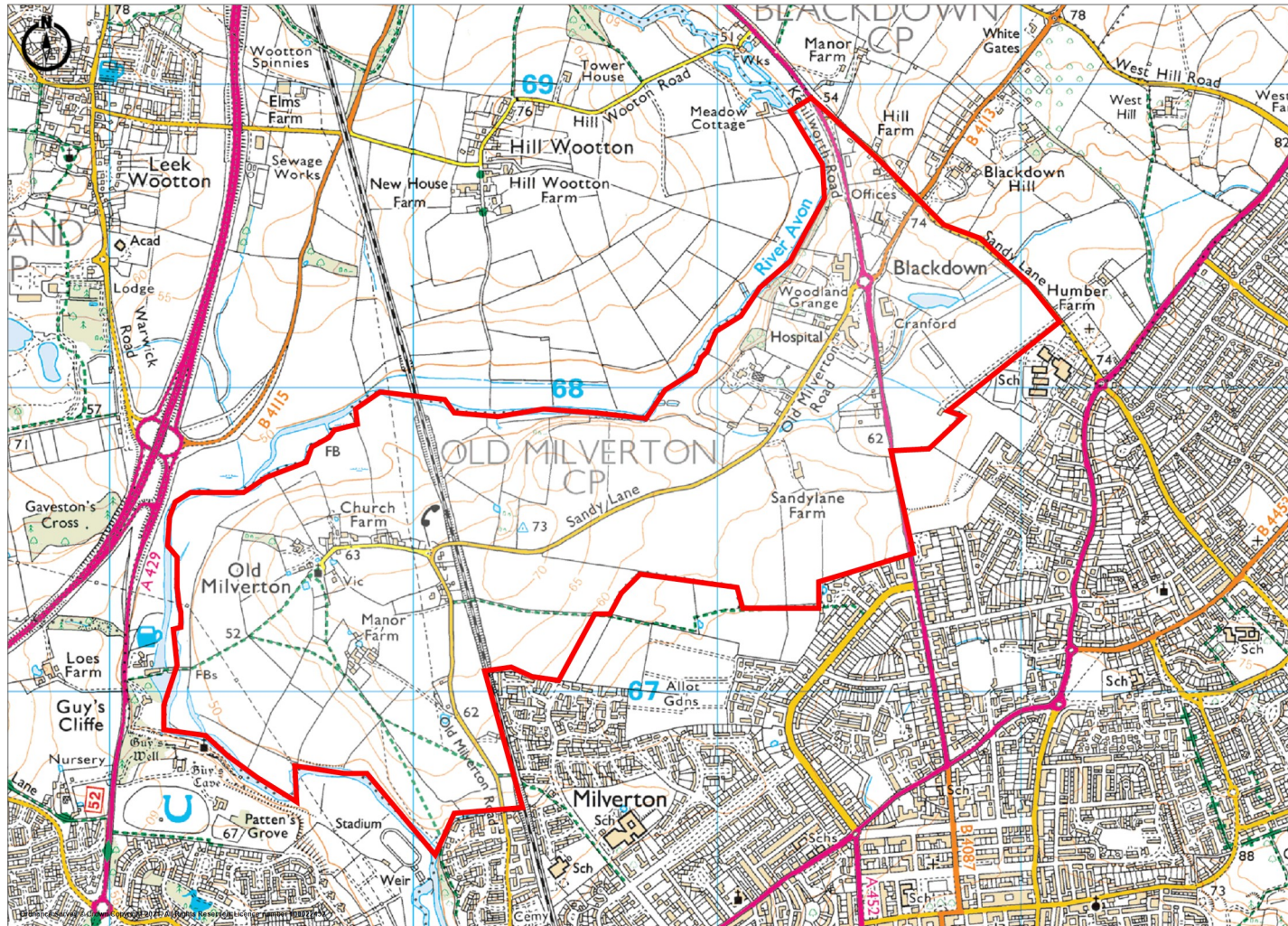
Yours sincerely

A handwritten signature in black ink, appearing to read 'Giles Brockbank', is written over a faint, illegible stamp or watermark.

**Giles Brockbank MRTPI
Partner
For Ridge and Partners LLP**

APPENDIX 2

Site Location Plan



Promap

● LANDMARK INFORMATION

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Plotted Scale - 1:22500. Paper Size - A4

